

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Alexandria Division*

UNITED STATES OF AMERICA

v.

VANCE, BERNARD DELANTE

a/k/a: "Delonte Franklin"

a/k/a: "Slugga Franklin"

*Defendant.*

Case No. 1:23-MJ-109

**FILED UNDER SEAL**

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, Carl Swanson, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Postal Inspector for the United States Postal Inspection Service ("USPIS"), assigned to the Washington Division and currently stationed at the Merrifield, Virginia domicile. I have held this position since April 2021. I am currently assigned to conduct investigations involving postal crimes and violations of the federal code, including mail theft, mail fraud, wire fraud, aggravated identity theft, and access device fraud. Prior to my role with the Postal Inspection Service, from January 2009 through April of 2021, I was a Special Agent with the United States Secret Service, and the Criminal Investigation Division of the Environmental Protection Agency. In those roles, I investigated multiple violations of the federal code, including wire fraud, bank fraud, identify theft, access device fraud, and federal violations pertaining to the Environment.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents and officers involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge of this investigation. I submit that this affidavit contains the information necessary to establish probable cause to support the criminal complaint. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint, and does not set forth all of my knowledge about this matter.

4. I make this affidavit in support of a criminal complaint charging Bernard VANCE with theft of stolen mail matter in violation of 18 U.S.C. § 1708. More specifically, the investigation has shown that VANCE, stole a USPS carriers mail satchel, or bag, containing undelivered mail along his Arlington, Virginia mail delivery route while inside his USPS vehicle. Later that same day, when identified by police, VANCE attempted to justify his custody of the USPS bag and undelivered mail by making false statements to police claiming to be a newly hired USPS mail carrier. Criminals are aware items of value are often mailed between individuals including gift cards, valuables, personal / business checks, etc. In addition to theft of gift cards, I know numerous scams exist involving the theft of checks and Personal Identifying Information (PII) that are often sent through the mail. These include card cracking where criminals steal checks, make counterfeit checks or “wash” / alter genuine checks, and recruit co-conspirators, or money mules, to obfuscate the deposits and cash out fraudulent checks to launder the proceeds

through the money mule bank accounts. The valuables and information contained within mail make it a target for criminals to exploit. As described more fully below, VANCE knowingly had in his possession stolen mail.

### **SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE**

#### *Initial Notification*

5. On the evening of Monday April 3, 2023, around 2000hrs, Arlington County Police Department (APD) notified Postal Inspectors that VANCE was detained at the Pentagon City Mall in possession of a USPS satchel, or bag, a USPS baseball cap, and mail belonging to Arlington County residents for the Columbia Pike, Arlington, VA 22204 zip code. Below is a photograph taken from the body worn camera of a responding officer showing VANCE wearing the stolen satchel and USPS baseball cap.



6. Approximately 50 unique pieces of mail, not including bulk advertisement mail, and parcels were found within the satchel VANCE was wearing when first observed. Additionally, some of the mail pieces found within the satchel had been rifled through and then separated into a plastic Ziplock bag inside the USPS satchel. Many of the mail pieces inside the Ziplock bag included tax documents containing PII, banking correspondence, and at least two personal checks one for \$1,000, and another for \$200, neither of which was in VANCE'S name. VANCE told officers he was a newly hired USPS mail carrier at the time of detention,<sup>1</sup> and the satchel and the mail inside the satchel belonged to him. That evening Inspectors verified VANCE was not a USPS Employee. USPS employees are required to have USPS identification cards while on duty, and VANCE was not in possession of any USPS identification cards or documents.

7. Your affiant reviewed the Body Camera footage of VANCE's arrest and observed VANCE wearing a USPS baseball cap while carrying a USPS satchel. During the video VANCE stated that he is a USPS employee on at least two occasions. VANCE also claimed that the mail located within the satchel is his "fan mail."

#### The Satchel

8. Your affiant responded to the USPS Post Office responsible for servicing the 22204 zip code and interviewed the manager and carrier responsible for the mail found within the USPS satchel recovered from VANCE the previous evening. Your affiant showed the USPS manager responsible for the postal carriers within the 22204 zip code a photo of VANCE. The postal

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<sup>1</sup> VANCE was detained by APD based on the fact that he matched the description of a suspect who was observed on security video abducting a female at 3219 Columbia Pike, Arlington, VA 22204 at or around 1730hrs that same day.

manager confirmed that VANCE was not a newly hired USPS carrier assigned to that USPS Post Office.

9. Your affiant interviewed the postal carrier who was responsible for the mail located within the satchel found in VANCE'S possession. The carrier stated the previous day, Monday April 3, 2023, his satchel was stolen from his USPS vehicle as he delivered packages to an apartment complex located in the 3700 Block of Columbia Pike, Arlington, VA 22204. The carrier stated he backed his USPS vehicle into a parking spot in front of 3718 Columbia Pike, Arlington, VA 22204, left his USPS satchel containing mail in a USPS mail tub in the passenger seat area of his vehicle, and proceeded to deliver parcels / packages as normal. At about 1800hrs, shortly after completing the parcel delivery and returning to his USPS vehicle, he realized his satchel was missing.

10. As carriers deliver various packages, they are required to electronically scan barcodes located on the packages to confirm delivery. The scans are timestamped and available for review within USPS databases. According to USPS records, the carrier made a parcel delivery to an apartment located within 3728 Columbia Pike, Arlington, VA 22204 at 1807hrs, within the same apartment complex as he parked his USPS vehicle, consistent with his statement to Inspectors. These facts suggest that the satchel was stolen sometime around 1800hrs on the evening of Monday, April 3, 2023, from the USPS vehicle located in front of 3718 Columbia Pike, Arlington, VA 22204.<sup>2</sup>

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<sup>2</sup> 3718 Columbia Pike, Arlington, VA 22204 where VANCE was observed on surveillance camera that day is approximately .3 miles from where the USPS vehicle was parked when the satchel was first discovered to be missing.

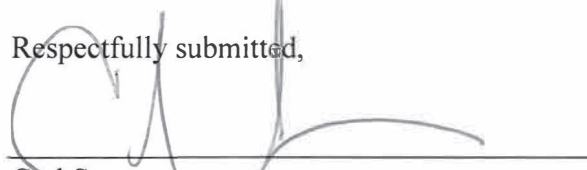
11. Your affiant showed the carrier the satchel and its contents. The carrier verified the mail found within the satchel was consistent with his route. He also identified personal items that were found within the satchel as belonging to him. The carrier stated the plastic Ziplock bag containing the two personal checks, as well as other items did not belong to him, nor did he open any of the mail found within the satchel prior to reporting the satchel stolen.

12. Your affiant interviewed the victim who had attempted to mail the two personal checks that were found in the Ziplock bag inside of the satchel. The victim stated she mailed two greeting cards which both contained a check written off of her Wells Fargo personal bank account at the beginning of April. According to the victim, neither card made it to the intended recipient who lives in the 22204 zip code in Arlington, Virginia. The checks were not made payable to VANCE, and the victim stated VANCE is not an authorized user of her bank account.

**CONCLUSION**

13. I submit that the foregoing facts established in this affidavit demonstrate probable cause that Bernard VANCE stole mail in violation of 18 U.S.C. § 1708. Accordingly, I respectfully request that the Court issue the proposed criminal complaint and arrest warrant.

Respectfully submitted,

  
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Carl Swanson  
Postal Inspector  
United States Postal Inspection Service

Respectfully submitted and attested to in  
accordance with the requirements of Fed. R.  
Crim. P. 4.1 via telephone on May 19, 2023.



Digitally signed by Ivan Davis  
Date: 2023.05.19 14:42:58 -04'00'

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Honorable Ivan D. Davis  
United States Magistrate Judge

Alexandria, Virginia